

**Congress of the United States**  
**Washington, DC 20515**

January 23, 2019

Steve Mnuchin  
Secretary  
U.S. Department of the Treasury  
1500 Pennsylvania Avenue, NW  
Washington, D.C. 20220

Dear Secretary Mnuchin:

I am writing regarding serious concerns I have with a transaction that took place between yourself and Leonid Blavatnik, a Ukrainian-born oligarch with close ties to U.S. sanctioned Russian billionaires Oleg Deripaska and Viktor Vekselberg. This transaction is especially alarming given a New York Times report that these individuals appear to have benefited from the sanctions relief package you proposed in December as Treasury Secretary. The fact that you did not recuse yourself from deliberations surrounding the proposed termination of sanctions on RUSAL and En+ is deeply troubling and a conflict of interest.

It has been reported that you sold an interest in the entertainment company RatPac-Dune to Blavatnik. Blavatnik is a former board member of RUSAL, which was the intended beneficiary of recently proposed sanctions relief. Blavatnik and Vekselberg are partners in SUAL. SUAL is a major shareholder of RUSAL and its stake will be increased as a direct result of the sanctions relief package. Blavatnik had a clear financial interest in the outcome of the Treasury action. Additionally, one of Blavatnik's companies, Access Industries, contributed \$1 million to the Trump Inauguration.

There is no question that you did in fact sell an interest in RatPac-Dune, per your financial disclosure for the period in question that reports the RatPac-Dune transaction. In it, you disclosed a capital gain of more than \$5 million to you personally and a capital gain of more than \$5 million to a trust for your children. The Hollywood Reporter listed the sale price at \$25 million.

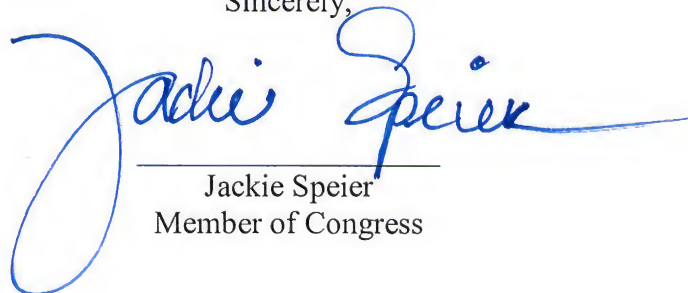
Given your business relationships with these individuals and your involvement in twice delaying sanctions, weakening the penalties, and eventually proposing relief from sanctions there is clearly a conflict of interest. Therefore, no action should be taken on Treasury's sanctions proposals regarding RUSAL and En+ until Congress has fully evaluated your answers to the following questions:

- Regarding previously disclosed transactions involving you and your dependents selling your interest in Rat-Pac:

- Which individuals and entities purchased your shares in Rat-Pac and on what dates?
- What are the names of any LLCs involved in these transactions, their locations, and beneficial owners?
- How many shares did they purchase?
- What was the value of each of those transactions?
- Did the purchaser(s) have any affiliation with U.S.-sanctioned individuals or entities?
- Did you obtain ethics advice before engaging in these transactions?
  - If yes, what advice did you receive?
  - If no, why not?
- Did you obtain any ethics advice before engaging in or influencing deliberations about amending sanctions applied to companies affiliated with Deripaska?
  - If yes, what advice did you receive?
  - If no, why not?
- Have you ever sought an opinion from Treasury's ethics office or the Office of Government Ethics on your involvement in sanctions issues?
  - If yes, what advice did you receive?
  - If no, why not?
- Were individuals involved in implementing or amending sanctions on Deripaska aware of your previous financial relationships with shareholders in Deripaska's companies?
- Did James Packer sell shares in Rat-Pac in 2017?
  - If so, how many shares did he sell and what price did he receive?
- Do you or did you hold any direct or indirect financial interest in entities subject to U.S. sanctions, or those that have been considered sanctions candidates by Treasury officials?
- Have you ever influenced deliberations on sanctions applications when they involved an entity in which you had a financial interest or with which you had a relationship?
- Has Blavatnik, his agent, or any other sanctioned individual sought to appeal to you directly about sanctions issues?

I look forward to your response to this letter within two weeks of receipt. Please contact Mitchel Hochberg on my staff at [Mitchel.Hochberg@mail.house.gov](mailto:Mitchel.Hochberg@mail.house.gov) or 202-225-3531 with any questions.

Sincerely,



Jackie Speier  
Member of Congress